

# Consultation response form

Please complete this form in full and return to [Channel4LicenceRenewal@ofcom.org.uk](mailto:Channel4LicenceRenewal@ofcom.org.uk)

Consultation title	Reconsultation: Channel 4 Licence Renewal
Full name	[REDACTED]
Contact phone number	[REDACTED]
Representing (delete as appropriate)	Organisation
Organisation name	Ofcom Advisory Committee for Scotland
Email address	[REDACTED]

## Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	Nothing
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	None
For confidential responses, can Ofcom publish a reference to the contents of your response?	Yes

## Your response

Question	Your response
Question 1: Do you agree with our assessment of the potential impact on specific groups of persons?	Confidential? – N The Advisory Committee for Scotland (ACS) advises Ofcom about the interests and opinions, in relation

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	<p>to communications matters, of persons living in Scotland. The response from the ACS to this consultation draws on the knowledge and expertise of ACS members and is informed by our individual experience and through discussion at our meetings. It does not represent the views of Ofcom or its staff.</p> <p>In our response to this consultation, we would like to reiterate our advisory remit, as it extends to Scotland, and we will therefore concentrate on those areas that we believe are of particular interest and importance to Scottish consumers.</p> <p>We believe that Ofcom is underestimating the potential positive impact that changes in Out of England quotas for C4C would have within the three Nations.</p> <p>In response to the previous Ofcom consultation (6 December 2023) representation from each of the Nations, (including the three Nations creative agencies, numerous production companies, Directors UK, PACT, Parliamentarians from Westminster, the House of Lords and all of the devolved parliaments) provided strong evidence of the substantial positive impact that would follow increasing the quotas. They also reiterated that each of the sectors were already delivering world class content to other broadcasters and was therefore ready and able to work with C4C to bring them the innovative ideas that they need.</p> <p>By accepting C4C's conservative suggestion of an increase, in terms of what they believe would be manageable (12%), Ofcom is also accepting an overestimate of the risk to the broadcaster.</p> <p><i>Ofcom states that 'our proposal provides C4C with sufficient flexibility to develop and realise its latest 'digital-first' strategy'.</i></p> <p>We should note that C4C has already been given a great deal of flexibility by the regulator</p> <p>It is now allowed a service neutral approach to content, it is able to develop its own inhouse production arm, therefore opening an important IP revenue stream, and the Media Act ensures its prominence online, beside the other PSBs.</p>

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	<p>We believe that behind this re-consultation remains the suggestion that increase the Out of England quotas, in some way, will affect C4C's flexibility and sustainability in the future. This ultimately imbues these quotas with an element of burden and negativity. We would reiterate that increasing production from the Nations should be seen as a positive opportunity for C4C, actually helping it to deliver its stated aims of championing unheard voices, to innovate and to take bold creative risks and to stand up for diversity across the UK. The production sectors from the three Nations have been delivering UK and global successes. Outlander, Game of Thrones, Dr Who – the evidence speaks for itself. C4C can only benefit from this expertise, talent and unique story telling. We understand a nervousness with C4C regarding a commitment to working more closely with the production sectors of the three Nations. A historical lack of investment in the Nations and therefore a current lack of connection and understanding of the talent that exists outside of the English regions is inevitable. But this needs to change if C4C want to deliver their ambition to represent those unheard voices. As they themselves state on the front page of their website.</p> <p><i>Channel 4 has a strong commitment to representing the whole of the UK. It means using our strong brand and wide reach to elevate unheard voices – from diverse communities, emerging writers and producers, to those who have different points of view or experiences.</i></p> <p>16% of those diverse communities, emerging writers and producers live and work in the three Nations and are waiting to engage with C4C.</p>
<p><b>Question 2: Do you agree with our Welsh language impact assessment?</b></p>	<p>Confidential? – N</p> <p>No comment</p>
<p><b>Question 3: Do you agree with our proposals that:</b></p> <p>a) until 31 December 2029, in each calendar year at least 9% of the hours of programmes made in the UK for viewing on the Channel 4 service must be</p>	<p><b>Question 3: Do you agree with our proposals that:</b></p> <p>No</p> <p>We refer 4; to our response to the previous Ofcom consultation on C4 (6th December 2023) and to the DCMS consultation on a potential change of</p>

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<p>produced outside England, and at least 9% of the expenditure on programmes made in the UK for viewing on the service must be allocated to the production of programmes outside England and referable to programme production at production centres in Scotland, Wales and Northern Ireland?</p> <p>b) with effect from 1 January 2030, in each calendar year at least 12% of the hours of programmes made in the UK for viewing on the Channel 4 service must be produced outside England, and at least 12% of the expenditure on programmes made in the UK for viewing on the service must be allocated to the production of programmes outside England and referable to programme production at production centres in Scotland, Wales and Northern Ireland?</p>	<p>ownership of Channel 4 in 2021. In each of those responses we reiterated the following recommendations.</p> <p>We recommend that the quota for production (by hours and by expenditure) in the three Nations should be 16%</p> <p>We recommend that this is further broken down by Nation (Scotland, Wales and N Ireland) reflecting their population.</p> <p>We continue to believe that C4 should now be in a position to deliver 16% of production from the 3 Nations of the UK. We believe that this would not only be beneficial for the sectors within the Nations but also to C4, delivering the innovative content that they seek. Unlike the 12% suggested, 16% is not an arbitrary number. It reflects the UK populations and has already been a successful BBC Nations quota for many years.</p> <p>However, we understand that it will take some time for C4 to establish good working relationships with each sector and therefore we do accept that 16% is not achievable immediately.</p> <p>We suggest that 16% is a target set to be delivered within ten years of renewal of this licence. It is obviously up to Ofcom to determine the length of the new licence. However, as other PSBs have recently had their licences renewed for a ten-year period, we would suggest that a ten-year strategy is acceptable to deliver this change.</p> <p>We would also suggest that Ofcom place a further target that by 2035, the 16% will be broken down by nation, based on population. We accept that placing a requirement to deliver this split during the transition and development ten-year period would be difficult but would urge Ofcom to consider it an acceptable target for the of 2035.</p> <p>In order to deliver this, Ofcom should require C4C to deliver a 10yr strategic plan, detailing how they will achieve the 16%. This should be accompanied by annual plans, reviewing progress and targets, against the 16% and home nation breakdown.</p> <p>We would also like to add our support to a recommendation, outlined in the response from the Ofcom Advisory Committee for N Ireland, to</p>

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	<p>the consultation on C4C (6<sup>th</sup> December 2023). They argue that there should be a board member on the C4C board, with a specific remit to ensure the Nations (and UK regions) are being served properly. We agree with this suggestion as it would help C4 truly reflect the United Kingdom and N Ireland, both in its commissioning and output, and deliver their vision of 4alltheUK</p>
<p><b>Question 4: Do you agree with our proposed guidance for C4C on how it should report on its MoE production in its SMCP?</b></p>	<p>Confidential? – N</p> <p>No – refer to our answer to Question 3.</p> <p>Although transparency and engagement is welcomed, without goals and targets attached, annual reporting will not guarantee the outcomes that the sector and Ofcom will be seeking.</p>

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